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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JASMINE BURGESS,

Plaintiff,

-against-

MAJOR MODEL MANAGEMENT, INC., and
GUIDO DOLCI,

Defendants.
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1:20-cv-02816-GHW

ORDER

GREGORY H. WOODS, District Judge:

For the reasons described on the record during the June 8, 2021 conference:

1. Defendants are directed to provide complete updated interrogatory responses to Plaintiff's interrogatory request Nos. 1-2 within two weeks.
2. Defendants are directed to produce copies of the contracts within their possession, custody or control:
 - (i) for currently available electronic copies concerning Plaintiff and the models named in the Defendants' amended complaint against Muse models (the "Muse Models") within one week of this Order;
 - (ii) for currently available electronic copies concerning other putative class members within two weeks of this Order; and
 - (iii) for all remaining contracts within four weeks of this Order.

With the exception of Plaintiff, all names and identifying information of putative class members will be redacted and replaced with a unique identifying alpha-numeric code.


3. Defendants are directed to produce the responsive database reports and exports:
 - (i) for Plaintiff within one week of this Order;
 - (ii) for the Muse Models within two weeks of this Order;

- (iii) for the remaining models within forty-five days of this Order.
4. By no later than June 15, 2021, Defendants are directed to provide Plaintiff with a list of the responsive arbitrations and litigations. Defendants are further directed to produce the responsive materials in *Raske v Major Model Management Inc.*, No. 0653535/3018 (N.Y. Sup. Ct.) and *Shanklin v. Wilbelina Models, Inc.*, [sic] No. 0653702/2013 (N.Y. Sup. Ct.), by no later than June 22, 2021.
 5. Defendants are directed to produce all responsive employee manuals, job descriptions, job announcements, job postings, and performance evaluations within thirty days of this Order. Defendants are further directed to produce currently available information on a rolling basis prior to the expiration of the thirty-day period.
 6. The parties are directed to confer regarding the text of a stipulation regarding the issues of expenses and income, *see* Dkt. No. 68 at 5, and provide the Court with a status letter by no later than June 22, 2021.
 7. With respect to Plaintiff's additional electronic document search-based discovery requests, within three weeks of this Order, Defendants are directed to provide hit reports totaling: (1) the number of unique documents responsive to each such electronic document search request and (2) the overall number of unique documents responsive to all such electronic discovery search-based requests. Within four weeks of this Order, the parties are directed to submit a joint proposal, or competing proposals, on the appropriate scope of electronic document searches concerning these requests.
 8. The Court declines to rule on Defendants' application for shifting the costs of discovery to Plaintiff. If Defendants wishes to submit a formal application for fee-shifting, they are directed to submit that application by no later than July 6, 2021.

9. The Court further declines to rule on Plaintiff's application regarding sanctions related to any spoliation of evidence. If Plaintiff wishes to renew its application, it is directed to do so in accordance with the current version of the Federal Rules of Civil Procedure.

SO ORDERED.

Dated: June 11, 2021
New York, New York



GREGORY H. WOODS
United States District Judge